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October 18, 2006

Honorable James H. Welsh  
Commissioner of Conservation  
Department of Natural Resources  
Office of Conservation  
P. O. Box 94275  
Baton Rouge, Louisiana 70804-9275

RE: 14700' Zone, Reservoir A  
**SIMON PASS FIELD**  
St. Martin Parish, Louisiana

Dear Sir:

Application is hereby made on behalf of Mannon Walters, Inc. to the Commissioner of Conservation for the calling of a public hearing, after legal notice, to consider evidence relative to the issuance of an order pertaining to the following matters relating to the 14,700', Reservoir A, in the Simon Pass Field, St. Martin Parish, Louisiana.

1. To dissolve the **14100' Sand Unit** as established by Office of Conservation Order No. 610-B, effective October 1, 1962; the **14300' Sand Unit** as established by Office of Conservation Order No. 610, effective October 1, 1962; and the **14600' Sand Unit** as established by Office of Conservation Order No. 610-A, effective October 1, 1962; all in the Simon Pass Field and simultaneously therewith, to create a single drilling and production unit for the exploration for and production of gas and condensate from the 14700' Zone, Reservoir A, in the Simon Pass Field, St. Martin Parish, Louisiana.

2. To force pool and integrate all separately owned tracts, mineral leases and other property interests within the unit so created.

3. To designate a unit operator and a unit well for the unit so created.

4. To provide that any future wells drilled to the 14700' Zone, Reservoir A, should be exempt from the spacing provisions of Statewide Order No. 29-E.

5. To provide that the Commissioner may reclassify the 14700' Zone, Reservoir A, by supplemental order and without the necessity of a public hearing should such reclassification be warranted, based on evidence furnished the Commissioner.

6. To discuss any other matters that may be pertinent to this application.

The 14700' Zone, Reservoir A, in the Simon Pass Field, St. Martin Parish, Louisiana, is hereby defined as being that gas and condensate bearing zone encountered between 14,135' and 15,270' electric log measured depths (13,927' to 14,824' true vertical depths) in the LLOG Exploration Company - SL 17599 No. 1 Well, located in Township 15 South, Range 13 East, St. Martin Parish, Louisiana.

In addition to furnishing the legal notice to all Interested Parties, the applicant will provide for POSTING of the legal notice of the hearing and unit plat in a prominent place in the area of the Simon Pass Field, St. Martin Parish, Louisiana, and will cause the legal notice of the hearing to be PUBLISHED in a newspaper of general circulation published in the vicinity of the Simon Pass Field, St. Martin Parish, Louisiana, at least fifteen (15) days before the hearing date.

Any pertinent data relating to the subject application can be obtained, **AT THE COST OF THE REQUESTING PARTY**, from Cambe Geological Services, 6300 Westpark, Suite 400, Houston, Texas 77057 (713-659-8363).

In compliance with the Rules of Procedure, a preapplication notice was given, but no request for a conference was received, and therefore, none was held.

There are attached hereto and made a part hereof a plat outlining the proposed unit and a list of the names and addresses of the Interested Owners, Represented Parties, and Interested Parties to whom this application is being sent. Pursuant to the Revised Rules of Procedure, such list of parties and proposed unit plat (being the same plat attached to the October 6, 2006 notice) are being furnished **ONLY** to the Commissioner of Conservation and to the District Manager of the Lafayette District of the Office of Conservation. However, said plat and the list of parties will be provided to any party requesting copies. A reasonable effort was made to ascertain the names and addresses of all Interested Owners, Represented Parties and Interested Parties.

Finally, there is enclosed our check on behalf of the applicant, Mannon Walters, Inc., in the sum of \$3020.00 payable to the Office of Conservation and representing the required hearing application fee.

Sincerely,

LEON E. COMEAUX & ASSOCIATES



Bill McAlister

BM/cu

Enclosures

cc: Mr. Richard Hudson  
Office of Conservation  
825 Kaliste Saloom Rd.  
Brandywine III, Suite 220  
Lafayette, Louisiana 70508

Interested Parties, Interested  
Owners and Represented Parties

R 13 E

CALCO  
S/L 2810  
1  
14270'

CALCO  
S/L 2162  
1  
14982'

22

*Williams, Inc.*

23

14700 RA SUA  
(UNDRILLED)  
± 816 ACRES

HUMBLE  
Ramos-Breaux  
B-1  
14612'

T  
15  
S

Ramos Inv. & Norman Breaux

Ramos Inv. & Norman Breaux

26

CALCO  
S/L 2810  
2  
14895'

CALCO  
S/L 2162  
2  
14464'

CALCO  
S/L 2162  
3  
15000'

DANIEL  
S/L 2162  
1  
14190'

LLOG  
S/L 17599

14 CALCO 4  
S/L 2162 15400' MD  
14933' VD  
15750'

CALCO  
S/L 2162  
5  
14732'

UNOCAL  
S/L 15693

1

15171' MD  
15121' VD

LAKE PALOURDE

EXHIBIT NO.

DOCKET NO.

**MANNON WALTERS, INC.**

**SIMON PASS FIELD**  
ST. MARTIN PARISH, LOUISIANA

PROPOSED UNIT  
14700' ZONE

Geology by: William S. McAlistar, Jr.

A horizontal line with vertical tick marks at the left end, the midpoint, and the right end. The left end is labeled '0', the midpoint is labeled '1000'', and the right end is labeled '2000''.

DATE:

LEON E. COMEAUX & ASSOC.      GEOLOGISTS

*As Per 610 Series of Orders*